

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---------------|---|------------------------------------|
| RIMSYS, INC., |) | |
| |) | |
| Plaintiff, |) | Civil Action No. 2:23-cv-01630-WSH |
| |) | |
| v. |) | |
| |) | JURY TRIAL DEMANDED |
| KAREN COHN, |) | |
| |) | |
| Defendant. |) | |

JOINT MOTION FOR LEAVE TO FILE UNDER SEAL
JOINT STATUS REPORT

Plaintiff Rimsys, Inc., and Defendant Karen Cohn (collectively, the “Parties”) move this Court for leave to file their Joint Status Report under seal, and in support thereof state as follows:

1. Pursuant to this Court’s September 15, 2023, Order (Dkt. 18), the Parties must file a Joint Status Report by September 27, 2023.
2. The purpose of the Joint Status Report is to address whether the Parties have been able to resolve part or all of Plaintiff’s request for preliminary injunction, in addition to advising the Court of the Parties’ respective positions on a 14-day extension of the Temporary Restraining Order that is currently in effect.
3. The Parties seek leave to file under seal their Joint Status Report because it references and cites documents that have been designated by the parties as “Confidential” pursuant to the Protective Order entered in this case (Dkt. 26).
4. Because these references are ubiquitous, the Parties propose filing only an unredacted copy of the Joint Status Report under seal; no redacted version will be filed and/or docketed.

WHEREFORE, the Parties respectfully request that the Court enter the attached proposed Order.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 27, 2023, the foregoing **JOINT MOTION FOR LEAVE TO FILE UNDER SEAL JOINT STATUS REPORT** was electronically filed and served by use of the Court's ECF system.

/s/Antoinette C. Oliver

Antoinette C. Oliver